

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREG ABBOTT, in his capacity as
GOVERNOR OF THE STATE OF TEXAS,
and THE STATE OF TEXAS,

Defendants.

Case No. 1:23-cv-00853-DAE

The United States' Witness List

The United States submits its Witness List pursuant to Western District of Texas Local Rule 16(f)(5). All witnesses may be contacted through undersigned counsel.

I. WITNESSES EXPECTED TO BE PRESENTED THROUGH LIVE TESTIMONY

1. Michael D. Chapman
2. Adrian Cortez
3. Micky Donaldson
4. Dr. Ben Johnson
5. Neil Lebsock
6. Tim MacAllister
7. Hilary Quam
8. Franciso Sainz
9. Capt. John Timmel

II. ADDITIONAL WITNESSES WHO MAY BE CALLED AS NEEDED¹

1. Isela Canava
2. Capt. Michael Cintron
3. Loren Flossman
4. Margaret Gaffney-Smith
5. Abraham Garcia
6. Mario Gomez
7. Ivan Morua
8. Capt. Brandy Parker
9. Joseph Shelnutt
10. Walker Smith
11. Additional witnesses as necessary to authenticate documents and/or establish documents as business records or government records.
12. Any witnesses designated and/or called at the Preliminary Injunction Hearing, or designated and/or called at trial, by Defendants.
13. The United States reserves the right to present witnesses to be used for impeachment only. See Western District of Texas Local Rule CV-16(f)(4).

Respectfully submitted,

Dated: July 26, 2024

JAIME ESPARZA
UNITED STATES ATTORNEY

TODD KIM
ASSISTANT ATTORNEY GENERAL
Environment & Natural Resources Division

¹ The United States identified U.S. Border Patrol Chief Jason Owens in their initial disclosures. Mr. Owens, however, is now unavailable for trial. The United States does not anticipate calling any USBP Headquarters personnel in their case-in-chief, but to the extent such a witness is necessary for rebuttal, the United States reserves the right to supplement this list with an available witness.

/s/ Landon A. Wade

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